

**Obermayer Rebmann Maxwell & Hippel LLP**

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*Attorneys for Kelly Phung and Studio KP LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**MICHAEL SCIORE and OLD CITY  
PRETZEL COMPANY, LLC,**

**Plaintiffs,**

**vs.**

**KELLY PHUNG, STUDIO KP, LLC,  
and JOHN DOES #1-8,**

**Defendants.**

No. 1:19-cv-13775-NLH-AMD

**NOTICE OF MOTION UNDER  
FEDERAL RULE OF CIVIL  
PROCEDURE 11**

**TO: THE CLERK OF COURT AND ALL COUNSEL OF RECORD**

Please take notice that on April 19, 2021, or as soon thereafter as counsel may be heard, Kelly Phung and Studio KP LLC (“Movants”), by and through their attorneys, Obermayer Rebmann Maxwell & Hippel LLP, will move before the Honorable Noel L. Hillman, United States District Judge for the District of New Jersey, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper

Streets, Camden, New Jersey 08101, for an award of sanctions under Fed. R. Civ.

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Please take further notice that, in connection with this motion, Movants will rely upon the attached memorandum of law and proposed order.

Dated: March 17, 2021

Respectfully submitted,

OBERMAYER REBMANN MAXWELL &  
HIPPEL LLP

/s/ Joshua B. Kaplan

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